

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

UNITED STATES OF AMERICA,

— v. —

KEITH J. GRAY

**No. 3:24-cr-250**

*Defendant.*

**DEFENDANT KEITH J. GRAY'S UNOPPOSED MOTION TO  
EXTEND THE DEADLINE TO SUBSTITUTE COUNSEL**

Defendant Keith J. Gray (“Mr. Gray”) hereby gives notice and respectfully requests a fourteen (14) day extension of the Court’s deadline to substitute counsel from March 5, 2025 to March 19, 2025, and in support states as follows:

1. On June 28, 2024, Ryan J. Meyer filed a limited notice of appearance for Mr. Gray solely for the purposes of his initial appearance, including determining his conditions of release and/or detention. *See* Dkt. No. 9. Magistrate Judge Toliver granted Mr. Meyer’s limited appearance and instructed Mr. Gray to retain counsel for his criminal case shortly.

2. Mr. Meyer has not otherwise been involved with Mr. Gray’s case since his Initial Appearance. Indeed, the Government has not provided even provided Mr. Meyer with discovery in the case.

3. On July 12, 2024, Scottie D. Allen (“Mr. Allen”) filed a notice of appearance on behalf of Mr. Gray. *See* Dkt. No. 12.

4. On February 3, 2025, Mr. Allen filed a Motion to Withdraw as counsel for Mr. Gray. *See* Dkt. No. 36.

5. The Court subsequently granted Mr. Allen’s Motion to Withdraw on February 3, 2025. *See* Dkt. No. 37. The Court then notified Mr. Meyer that it now considered him counsel of

record for Mr. Gray. At the same time, the Court entered an order notifying Mr. Gray that he had until March 5, 2025, to retain additional counsel and Mr. Meyer had until March 5, 2025 to file a motion to withdraw. Dkt. No. 40.

6. As previously noted in Mr. Meyer's Motion to Withdraw (Dkt. No. 41), Mr. Gray has been diligently seeking new counsel since February 3, 2025. Mr. Gray is now in advanced discussions with potential new counsel, but such counsel is currently in trial in the Eastern District of Texas.

7. As a result of their trial obligations, Mr. Gray's potential new counsel need additional time to complete the engagement, which process Mr. Gray reasonably believes can be completed by March 19, 2025. There are no other pending deadlines in this case, and this withdrawal can be accomplished without material adverse effect on Mr. Gray's interests.

8. This motion to extend the deadline to substitute counsel is requested in good faith and not sought for delay or any other improper purpose.

9. No party will be prejudiced by allowing this brief continuance.

10. Counsel has conferred with the Government and the Government is unopposed to this brief continuance.

WHEREFORE, for the reasons stated above, Keith J. Gray respectfully requests that the Court grant a fourteen (14) day extension of his deadline to substitute counsel from March 5, 2025 to March 19, 2025.

Dated: March 5, 2025

Respectfully submitted,

/s/ Ryan J. Meyer

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*Counsel for Keith J. Gray*

**CERTIFICATE OF CONFERENCE**

I hereby certify that I have conferred with counsel for the Government regarding the above motion and counsel for the Government is unopposed to the requested relief.

*/s/ Ryan J. Meyer*  
Ryan J. Meyer

**CERTIFICATE OF SERVICE**

I hereby certify that on March 5, 2025, I caused copies of the foregoing UNOPPOSED MOTION TO WITHDRAW to be served on all counsel of record by filing electronic copies with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all registered CM/ECF users.

*/s/ Ryan J. Meyer*  
Ryan J. Meyer